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UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA

In re:

PATRICIA G. OLSON,

Debtor.

**Case No. BK-N-17-50081-BTB
 Chapter 13**

**JOINDER IN MOTION FOR (1) ORDER
 AUTHORIZING TERMINATION OF ANY
 AND ALL AGREEMENTS WITH CODY
 BASS PURSUANT TO THEIR TERMS; OR,
 ALTERNATIVELY, (2) TO AUTHORIZE
 REJECTION AND TERMINATION OF
 LEASE AND ANY AGREEMENTS WITH
 CODY BASS PURSUANT TO 11 U.S.C.
 SECTION 365**

Hearing Date: May 18, 2017
 Hearing Time: 1:30 p.m.
 Courtroom: 2, 5th Floor

The City of South Lake Tahoe ("CITY") hereby joins in the motion of the Debtor Patricia G. Olson ("OLSON") in requesting the court to terminate and/or reject the lease between OLSON and CODY BASS ("BASS"). The real property at issue in this action (3443 Lake Tahoe Boulevard), the portion of which has been purportedly leased to BASS, is currently operating a medical marijuana dispensary, under the moniker Tahoe Wellness Cooperative ("TWC").

Pursuant to the CITY's municipal code, any medical marijuana dispensary is required to renew its permit to operate every two years. A critical component of that renewal application is written consent of the property owner to allow the renewal of the permit. BASS failed to provide the consent of OLSON and the renewal application was thereafter rejected. BASS' permit has expired and neither he nor TWC have a valid current permit. As a result of operating without a permit, the CITY issued citations (attached as Exhibit A to the Declaration of Thomas T. Watson, filed concurrently herewith) and admonished BASS to discontinue operations. BASS has failed to close the facility and continues to operate without a valid permit.

BASS filed a Petition for Administrative Mandamus in the Superior Court of California, in and for the County of El Dorado, seeking to have the court order the CITY to accept the permit application as complete, substituting an unsigned lease for the required owner's consent form. That case is currently pending in South Lake Tahoe, bearing Case Number SC20160208. The Superior Court issued an order that tolls, but does not suspend, the continuing issuance of citations, until a hearing on the Writ Petition can be heard. That hearing is scheduled for June 30, 2017.

The Petition will be moot if this motion is granted, as BASS' argument in the Superior Court action is that consent of the property owner is unnecessary because he purportedly has a valid lease. The CITY vigorously opposes that proposition, as it is in the best interests of the residents of the CITY that a highly regulated industry, such as medical marijuana dispensaries, must comply with every aspect of the CITY code, including a current consent of the landlord for a permit renewal. The basis for this requirement is that circumstances may significantly change after a lease is signed, as is particularly true in this situation, and the CITY should not be "held hostage" from active enforcement of its renewal requirements because the dispensary has a long term lease.

The CITY's position in this case and the Superior Court case is that BASS and TWC are currently operating in violation of SLTMC Section 6.55.730A. As a result of this continuing violation, the CITY respectfully requests this Court grant the Debtor's motion to terminate the BASS lease.

DATED: 5/1, 2017


 THOMAS T. WATSON
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